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July 19, 2019

**VIA ECF & MAIL:**

Hon. Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn New York 11201

Re: Raja v. Burns, et al, 19-cv-01328 (AMD)

Your Honor:

Please find enclosed plaintiff's papers in support of his motion for partial summary judgment and in opposition to defendants' motion to dismiss. All were filed by ECF.

Plaintiff's papers include:

- Notice of Motion for Partial Summary Judgment
- Declaration of Daniel L. Ackman in Support of the Motion for Partial Summary Judgment and Exhibits 1-13 (excluding #12)
- Memorandum of Law in Support of the Motion for Partial Summary Judgment
- Plaintiff' Rule 56.1 Statement
- Memorandum of Law in Opposition to the Motion to Dismiss and in Further Support for the Motion for Partial Summary Judgment
- Declaration of Daniel L. Ackman in Support of the Motion for Partial Summary Judgment and Exhibits 14-15 (including the Amended Complaint)
- Reply Memorandum of Law in Support of the Motion for Partial Summary Judgment

Plaintiff requests oral argument on these motions.

Respectfully submitted,

/s/

Daniel L. Ackman

Encls.

cc: Hon. Ramon E. Reyes, Jr. (by ECF & mail) (w/o encls.)  
All Counsel (by ECF) (w/o encls.)